

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

STEVEN J. PALANGE,  
for himself and as parent and next of kin of  
Minor child KP  
*PLAINTIFF*

V.

Richard Updegrove,  
Margarita Palange,  
Michael B. Forte,

The identity and quantity of all defendants are  
Not known at this time.

COMPLAINT FOR RELIEF FROM FEDERAL CIVIL RIGHTS VIOLATIONS

JURISDICTION

This complaint is brought pursuant to the laws and Constitutions of the  
United States of America and the State of Rhode Island.

Venue is proper in the United States District Court for the District of Rhode Island because the acts and omissions that give rise to this lawsuit originated in the District of Rhode Island.

### Parties

Steven Palange is the plaintiff and is a resident of the State of Rhode Island.

Richard Updegrove is a resident of Rhode Island and is a defendant in this matter.

Margarita is or was at all times relevant of the State of Rhode Island and is a defendant in the above-captioned matter.

Judge Sandra B. Lanni is and was at all relevant times an ASSOCIATE JUDGE OF THE RHODE ISLAND FAMILY COURT and upon information and belief a resident of the State of Rhode Island.

Michael B. Forte is a resident of the State of Rhode Island.

This complaint originates from the unlawful kidnapping, child-snatching, abduction of the minor child KP from her lawful custodian, guardian, next of kin, FATHER Steven J. Palange, the plaintiff in this matter on or about May 9, 2018.

### FACTS

On or around and about May 09, 2018, the above-mentioned defendants conspired with each other and many unidentified individuals to deprive, indefinitely, the Rhode Island Family Court, Myself, and my daughter KP of our Constitutional Rights to be from unlawful child-snatching, kidnapping, unlawful child custodial interference, and subversions of the due administration of justice without due process of law and without judicial, executive and executive authority.

ON OR ABOUT MAY 09, 2018, SAID DEFENDANTS CONSPIRED WITH EACH OTHER TO KIDNAP KP FROM HER FATHER WITHOUT JUDICIAL OR LEGAL AUTHORITY. Said conduct continues ongoing till present. In more simple terms, without cause, any allegation of any abuse, violence or

threat to any person KP and myself have deprived of each other for now more than three years without lawful authority.

COUNT 1

Deprivation of Federal Constitutional Right of the right to be free from criminal abduction of one's child from one's parent without due process of law.

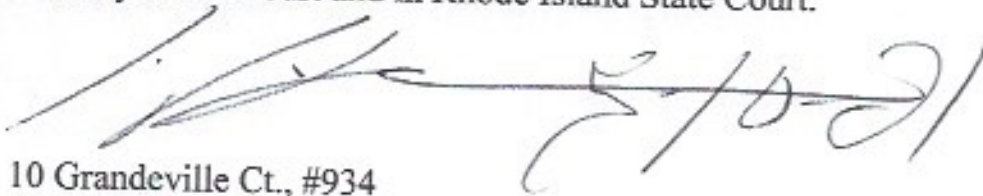
PRAYER FOR RELIEFVENUE

This complaint prays that this United States District Court finds that the defendants did violate Title 42 United States Code Section 1983 and any and all applicable, to this lawsuit, laws of the United States and the State of Rhode Island and all cognizable theories of law existing, presently and in the future. the Federal Civil Rights of me Steven J. Palange of Wakefield Rhode Island and award Steven the appropriate, necessary, and reasonable compensatory financial damages cost of litigation, The return of his daughter KP, now, before she is not a minor. And further prays for

declaratory relief and appropriate injunctive relief and to further restore  
unification of father and daughter in a humanely and timely manner

Steven J. Palange

By himself Pro Se, and on behalf of minor child KP who is not represented by an  
attorney in this court and in Rhode Island State Court.

A handwritten signature in black ink, appearing to read 'S. Palange', with a long horizontal stroke extending to the right.

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